

EXHIBIT P

BINGHAM

Sujal J. Shah
Direct Phone: 415.393.2955
Direct Fax: 415.393.2286
sujal.shah@bingham.com

May 17, 2012

Via Email

Dean Harvey, Esq.
Lieff Cabraser Heimann & Bernstein, LLP
275 Battery St., 29th Floor
San Francisco, CA 94111-3339

**Re: In re High-Tech Employee Antitrust Litigation,
11-CV-2509-LHK (N.D. Cal.)**

Dear Dean:

This letter responds to your March 22 and April 17 letters regarding proposed search terms, and follows up on our subsequent discussions.

As we mentioned at our April 2 conference, and as our testing has confirmed, the search terms that Plaintiffs originally proposed are overbroad and result in an overwhelmingly high false positive rate. This is equally true of the revised list you sent on April 17. Through our testing, we have modified your proposed set of terms to arrive at a final set that we believe is both reasonable and effective.

Enclosed as Exhibit A is that set of terms, which we are using to identify documents responsive to Plaintiffs' First and Second Sets of RFPs. Use of these search terms satisfies Intel's obligation to produce responsive documents subject to a reasonable search. Please note that Intel's technical searching capabilities allow for the use of word stemming, a more thorough alternative to wildcards. For example, with stemming, searching for the word "hire" (even if it is contained in quotation marks) brings back hits for the following: hire, hires, hired, hiring, hirings, hiree, and hirees. It also brings back common misspellings (e.g., hiring).

As we indicated in Frank Hinman's email on April 17, based on the parties' agreements regarding the scope of Plaintiffs' First Set of RFPs and Intel's responses to them, Intel is producing documents from the electronic files of the following custodians in the first instance: Diane Bryant, Deborah Conrad, Don Cooper, Christina Dickenson, Tina Evangelista, Pat Gelsinger, Gwen Hyder, Renee James, Patricia Murray, Paul Otellini, Paresh Pattani, Ranna Prajapati, and Paul Sathis. Based on the scope of Plaintiffs' Second Set of RFPs and Intel's responses to them, Intel will add two custodians to this list to ensure a comprehensive production: Casey Cunningham and Dave Woolsey. As indicated in Frank Hinman's email on April 17, and agreed upon by the parties at the April 18 case management conference, Intel will re-collect documents up to December 31, 2011 for the following DOJ custodians: Deborah Conrad, Pat Gelsinger, Patricia

Beijing
Boston
Frankfurt
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA
94111-4067

T +1.415.393.2000
F +1.415.393.2286
bingham.com

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Murray, and Paul Otellini. As you know, Mr. Gelsinger is a former employee, so this collection would be limited to additional documents that are available, if any.

Intel has spent a substantial amount of time and effort in a good faith attempt to propose reasonable and sufficient search criteria, consistent with the parties' meet and confer discussions. We hope the parties are now in a position to reach agreement on these issues.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Sujal J. Shah". The signature is fluid and cursive, with the first name "Sujal" being more prominent.

Sujal J. Shah

Enclosure

EXHIBIT A

SEARCH TERMS
"anti-poach" OR "no-poach"
"anti-trust"
"civil investigative demand"
"cold call"
"cold-call"
"counter-offer"
"courtesy agree" OR "courtesy agreement"
"courtesy list"
"do not approach"
"do not call"
"do not hire"
"do-not-hire"
"free market"
"gloves off"
"gloves on"
"hand off"
"hand -off"
"hand-off"
"hands - off"
"hands- off"
"never counter"
"no counter"
"no hire"
"no recruit"
"non - solicit"
"non- solicit"
"non -solicit"
"non-compete" OR non w/2 compete
"non-solicit"
"off limit"
"six month" w/2 rule
"won't" w/1 compete
(agree OR agreement OR hand OR handshake OR tacit OR understand OR recruit OR pay OR compensation OR bonus OR offer OR applica OR applicant OR candidat OR candidate OR target OR wage OR benefit OR morale OR fair OR hire OR compet OR competition OR employ OR employee OR verbal OR unwritten OR informal OR unspoken OR table OR deal OR permission OR green OR ok OR prospect OR "cold call" OR passive) w/5 (Adobe OR Apple OR Google OR Intuit OR Lucasfilm OR Lucas OR ILM OR Pixar)
(agree OR agreement OR hand OR handshake OR tacit OR understand OR verbal OR unwritten OR informal OR unspoken OR table OR deal OR permission) w/5 (secret OR "not known" OR "do not tell" OR hush OR "don't tell" OR "can't tell" OR "cannot tell" OR quiet OR hidden OR hide OR hid OR cover OR disguise OR veil OR suppress OR "hold back" OR HR OR "human resources")
(compet OR competition) w/5 (employ OR employee OR labor OR talent OR candidate OR jobs OR compensation OR jobs OR compensation OR pay OR salar OR salary OR interview OR benchmark OR survey OR poach OR recruit OR hire)
(Ed OR Edward) w/2 Martin
(gent OR gentlemen) w/2 (agree OR agreement)
(gent OR gentlemen) w/2 (polic OR policy)
(gent OR gentlemen) w/2 understand
(hand OR handshake) w/2 (agree OR agreement)

EXHIBIT A

SEARCH TERMS
(hand OR handshake) w/2 (polic OR policy)
(hand OR handshake) w/2 understand
(handshake OR "hand shake" OR tacit OR understand OR recruit OR pay OR compensation OR bonus OR offer OR applica OR applicant OR candidat OR candidate OR target OR wage OR benefit OR morale OR fair OR hire OR compet OR competition OR employ OR employee OR verbal OR unwritten OR informal OR unspoken OR table OR permission OR green OR prospect OR passive) w/5 (Dell OR Cisco OR Micron OR Sun OR ATI OR "Array Technologies Inc" OR nVidia OR VMWare OR Cray)
(Jim OR James) w/2 Morris
(Jon OR John OR Jonathan) w/2 Rosenberg
(Michael OR Mike) w/2 McNeal
(no OR non OR never OR "don't" OR "do not" OR "can't" OR cannot OR "can not") w/2 solicit
((not OR never OR "don't" OR "can't" OR cannot OR stop OR "won't") w/3 (hire OR recruit OR employ OR employee OR offer)) AND (apple OR adobe OR intuit OR google OR lucasfilm OR lucas OR ilm OR pixar OR dell OR cisco OR micron OR sun OR ati OR nvidia OR vmware OR cray)
(prohib OR prohibit) w/2 (recruit OR hire OR call OR contact)
Alan w/2 Eustace
Ann w/2 Reeves
antitrust
Arnnon
Baja
Bechtel
bid w/2 war
Bill AND Intuit
Bill w/2 Campbell
Bock
Brad w/2 Smith
bully
BZ
Catmull
Chizen
CID
Coker
coldcall
colligan
Cook w/2 Tim
Cottle
croner
Currey
Daivd w/2 Alvarez
Dana w/2 Burns
Danielle w/2 Lambert
do w/3 recruit
doj
dunlap
Elop
Eric w/2 Google
Eric w/2 Schmidt
eschmidt
evil

EXHIBIT A

SEARCH TERMS
Felch
Fennell
Gaither
Gavgavian
Geshuri
GWL
hands w/2 off
handsoff
honor w/5 (agree OR agreement OR understand OR process OR arrangement)
illegal
informal w/2 (agree OR agreement)
informal w/2 (polic OR policy)
informal w/2 understand
injunction
James w/2 Stephens
John w/2 Brennan
Judy w/2 Gilbert
justice
Kerry w/2 McLean
laika
Laszlo
limit w/5 (compet OR competition)
Lintner
Lori w/2 McAdams
Mark w/2 Bentley
moratorium
Morris w/2 Donna
Murray w/2 Demo
Narayan
no w/1 (compet OR competition)
no w/2 fly
no w/2 hire
no w/3 touch
notif w/5 HR
okay w/2 hire
passive w/5 (candidate OR person OR employ OR employee OR people OR talent)
permission w/5 (offer OR bid OR recruit OR hire OR call)
Petroff
pillag
poach
radford
Schmidt AND Google
Scott w/2 Gilfoil
Shantanu
Shona w/2 Brown
sjobs
Steve w/2 Jobs
Steve w/2 Mair
Stinson

EXHIBIT A

SEARCH TERMS
subpoena
tacit w/2 (agree OR agreement)
tacit w/2 (polic OR policy)
tacit w/2 understand
Tim w/2 Larson
Tom w/2 Moyer
Townsley
trespass
unlawful
unspoken w/2 (agree OR agreement)
unspoken w/2 (polic OR policy)
unspoken w/2 understand
unwritten w/2 (agree OR agreement)
unwritten w/2 (polic OR policy)
unwritten w/2 understand
verbal w/2 (agree OR agreement)
verbal w/2 (polic OR policy)
verbal w/2 understand
Vijungco
Voort
Whiteley